BROWN GAVALAS & FROMM LLP Attorneys for Defendants 355 Lexington Avenue, Fourth Floor New York, New York 10017 Tel: (212) 983-8500

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PING AN PROPERTY AND CASUALTY INSURANCE COMPANY OF CHINA LTD., AS SUBROGEE OF CHINA INTERNATIONAL FUND LTD.,

Plaintiff,

-against-

Fax: (212) 983-5946

HIGH SEAS SERVICOS MARITIMOS LDA, BNAVI SHIP MANAGEMENT (INDIA) PRIVATE LTD., BNAVI S.P.A. and BNAVI SHIP MANAGEMENT S.R.L.,

Defendants.		
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08 Civ. 3296 (VM)

NOTICE OF RESTRICTED APPEARANCE PURSUANT TO FED. R. CIV. P. SUPP. RULE E(8) OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS

## TO THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that BROWN GAVALAS & FROMM LLP has been retained by all Defendants in the above-entitled action, and hereby demands that copies of all proceedings in this action subsequent to the Summons and Complaint be served upon BROWN GAVALAS & FROMM LLP at its office as listed below.

PLEASE TAKE FURTHER NOTICE that Defendants, by their attorneys, BROWN GAVALAS & FROMM LLP, hereby enter a restricted appearance pursuant to Supplemental Rule E(8) of the Fed. R. Civ. P., solely to defend against the alleged admiralty and maritime claims asserted by plaintiff, PING AN PROPERTY AND CASUALTY INSURANCE

COMPANY OF CHINA LTD. a/s/o CHINA INTERNATIONAL FUND LTD. with respect to money, funds, and electronic fund transfer payments restrained by garnishees named in the Process of Maritime Attachment and Garnishment issued in this matter, and any other or supplemental garnishees who may restrain the property of Defendants and as to which there has issued Process of Maritime Attachment and Garnishment, reserving all defenses available to Defendants including, but not limited to, personal jurisdiction, venue, and service.

Dated: New York, New York July 17, 2008

BROWN GAVALAS & FROMM LLP Attorneys for Defendants

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By:

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TO:

Via ECF Clerk of the Court United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Via ECF Law Offices of Rahul Wanchoo Empire State Building 350 Fifth Avenue, 59<sup>th</sup> Fl. New York, New York 10108